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THE METROPOLITAN WASHINGTON EAR, INC.

A radio reading service for the blind and physically handicapped

A NON-PROFIT CORPORATION

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In the Matter of	}	
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Closed Captioning and Video Description)	MM Docket No. 95-176
of Video Programming)	

Comments of The Metropolitan Washington Ear

Margaret R. Pfanstiehl, Ed.D. Founder and President
Co-founder of the audio description movement

My husband Cody and I founded the audio description movement in April, 1981, so we are pleased to have this opportunity to express our views.

We will refrain from commenting upon highly technical or legal sections, leaving this to others who are more qualified in these areas.

For people who are visually impaired and blind The Metropolitan Washington Ear, established in 1974, operates a radio reading service, a dial-in news service and the original audio description service. Since we developed audio description (AD) in Washington at Arena Stage 15 years ago, this accessibility has spread to live theaters throughout the U.S, and to Australia and Europe, and to a very limited extent to television and museums.

In 1982, even before WGBH became interested in providing service for people who are visually impaired and blind, we were experimenting with audio description on TV with PBS's American Playhouse and Nova.

This was before the SAP channel. PBS sent our description track up to the PBS satellite, down to 18 PBS stations (including WETA-TV), then landline to local radio reading service transmitters and over the air to home radio receivers in synch with the show on the home TV screen. Expensive, complicated.

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The heavenly marriage

In 1985, with the advent of stereo and the SAP channel, WGBH staff asked us to work with them toward what later became the WGBH Descriptive Video Service (DVS). We had developed the art of describing. They knew how to deliver the service via the SAP channel. "A marriage made in heaven" said a WGBH official. We trained the first describers at WGBH for their first local test.

In the winter of 1987-1988 in our modest studios in Silver Spring, Maryland, our volunteers wrote and voiced all the descriptions produced for WGBH's national test. In December 1989 we trained the first describers for DVS before they went on the air in January, 1990. Later in 1990 we trained a second group.

An Emmy for pioneering

Also in 1990 I was awarded an Emmy by The National Academy of Television Arts and Sciences for "leadership and persistence in the development and implementation of television for the visually impaired".

We have trained hundreds of describers in the art of description for theaters, television and museums. We produced the first audio description track for an IMAX film: "To Fly" at the Smithsonian's National Air and Space Museum. On a limited basis we continue to produce AD for videos for The National Park Service and other federal and local agencies concerned with accessibility for the handicapped. We have produced descriptive tapes for museums at The Statue of Liberty, Ellis Island, The National Building Museum and others.

On May 24, 1994 I testified before the Senate Committee on Commerce, Science and Transportation concerning the Communication Act of 1994.

Before founding The Metropolitan Washington Ear I worked as both a teacher and later a rehabilitation counselor of low vision and blind students and adults. I took my doctorate in education at The Institute for Child Study at The University of Maryland in 1971. I am severely visually impaired. I learned braille at the age of 30.

The coalition

In 1995 my husband and I established a coalition of 17 leading organizations (see attached) concerned with low vision, blindness, and aging in an effort to increase the availability of descriptions, beginning with the home video market.

Meetings in Hollywood

In November, 1995, in meetings facilitated by The Motion Picture Association of America (MPAA), we met with key executives of five major Hollywood studios. We pointed out that motion picture producers pay millions to add captions for people who are hearing impaired but pay virtually nothing to add audio description for people who are visually impaired. This, we said, is rank discrimination.

We urged that description be added to films as a regular part of post-production. Once married to the film or program, this accessibility can always be available in various uses of the production -- home videos, broadcast TV, cable, theaters etc.

And we said there is an unserved market of at least 12 million potential customers out there whose vision is too poor to derive adequate information from a TV or movie screen.

The chicken and the egg

On January 31st, 1996, again facilitated by MPA, we met with Turner Home Video in Atlanta, and the following day with the president of Blockbuster Domestic Video Division in Florida. We urged Blockbuster to agree to purchase sufficient numbers of described videos to make it feasible for the motion picture studios to add description to films. The studios have indicated that they would be willing to do so if there were even a minimum market of 2,000 nationally. We are currently working on this chicken and the egg situation.

At present, descriptions cannot be placed on the same closed captioned video cassettes which are rented to the general public. For the time being the described version must be produced on a separate cassettes thus necessitating dual inventory. This merchandising is now being tested by Blockbuster in 10 cities with a very limited number of WGBH-described videos. They are reluctant now to meet the challenge of purchasing greater numbers of described videos even if they become available.

Descriptions, captioning and numbers

Greatly increased video descriptions are long overdue. Unfortunately, video description has not developed at the same pace as closed captioning. The market for captioning is larger, but 12,000,000 is not an insignificant number of people whose lives would be positively affected by well produced descriptions.

We believe the NOI figure of 8 million is too low. Based on statistics generally agreed upon by The American Foundation for the Blind, The Prevention of Blindness Society and The American Council of the Blind among others, we commonly use the higher figure. This does not include people with literacy problems, people for whom English is a second language, or students and adults with special learning disabilities.

Public interest benefits

9. 10. For better or for worse, television and videos are extremely important mediums in today's society. The cumulative affect of being cut off from all or most of the essential visual elements of these media definitely contributes to poorer social relationships for low vision and blind people and an increasing isolation from mainstream society. A lack of awareness of body language, facial expressions, actions, modes of dress and the appearance of many settings in our environment which normally sighted people commonly derive from viewing television can distance visually impaired people from family, friends and coworkers. This can make them seem somehow "different" and lacking in knowledge of commonly held information.

In some programs the visual elements comprise the major portion of the content. Inability to follow the action on the screen makes it impossible to follow the plot.

Much of the information in well crafted descriptions is not ordinarily available to low vision or blind people because it does not generally come up in day-to-day conversations or within books or print media made accessible to the blind through recordings or braille.

Sighted people commonly learn through simple observation not only from TV or movie screens, but also by driving or walking through a variety of locations. This avenue of learning is largely not available to people with low or no vision. If the majority of TV programs and videos were well described, these media could greatly help to compensate for this serious information deficit.

Aiding education

Unfortunately these visual deficits occur not only for leisure or recreational activities, but also in the course of acquiring a basic education. While classmates both see and hear the information contained in educational videos, low vision and blind students are mostly restricted to what they can glean from the sound track alone.

A study conducted by The American Foundation for the Blind several years ago demonstrated that in spite of the many frustrations, low vision and blind people were "watching" television up to four hours a day. Can you imagine what it would be like to "watch" dramas, sitcoms, cartoons, docudramas and nature programs when you can derive little or no information from the TV screen?

"Viewing" choices

Without descriptions the "viewing" habits of low vision and blind people for obvious reasons may tend toward the more talky programs. But with adequate descriptions the television habits of visually impaired people will mirror those in the general population because blindness will not be the overriding factor in program selection. It will instead be the level of education, income and special interests.

The blind population consists of people of all ages and backgrounds. But increasingly it is a somewhat older population since many people lose vision later in life. This is the only generality which can be safely made -- except for the fact that most do not drive automobiles.

Questions about a study

At present there is a study in progress funded by the Department of Education in an attempt to learn more about the types of programs low vision and blind people would like to watch and how they would respond to increased numbers of described programs. Some of us in the field of work for the blind are concerned about this study, especially because of its sampling techniques. The sample includes a high percentage of people with reasonably useful vision. This group could not possibly have the same dependence upon descriptions as people who have little or no vision.

Others benefit too

11. 12. Described programs have other benefits beyond directly aiding low vision or blind people. Family members and friends of the visually impaired are released from the task of providing on the spot descriptions while viewing a program which they, the ad hoc describers, have never seen before. Ad hoc describing varies from good to very poor. It also places the visually impaired viewer in a dependent status. But if the program is professionally described the viewing can become a truly shared social experience as it would be with two or more normally sighted viewers.

Sighted people benefit

The Narrative Television Network says 65% of its viewers are sighted. Sighted people frequently say that the descriptions enhance their powers of observation by bringing out details which they would have overlooked. Descriptions are also useful for sighted viewers focusing upon handiwork or involved in housework or other activities which make it difficult to pay close attention to the TV screen.

So do English learners

There are definitely two more groups within the general population which benefit from descriptions. The first group is perhaps 10 to 12 million students and adults who are learning English. Being able to view the screen while simultaneously hearing a well crafted verbal description of what they are seeing most certainly improves their vocabulary and language skills.

And those with learning difficulties

A second group of perhaps 4 million who could benefit are students and adults with special learning difficulties. The repetition and reinforcing process of both seeing and hearing the same information simultaneously helps people who have problems learning through only one channel.

An aid to literacy

The question of descriptions improving literacy is less clear. The benefits would probably be more indirect by improving vocabulary and fluency of expression rather than the more

obvious benefits obtained from closed captioning where the viewer can simultaneously see and hear the spoken dialogue.

The elderly

As people live longer the numbers of senior citizens are increasing every decade. The incidence of legal blindness and/or partial vision rises sharply after age 50. There is no doubt that described programs will become increasingly important to more and more older people. Well crafted descriptions help low vision people make better use of whatever vision they still have.

Availability

14. At present the sources for described programs are a limited number of weekly programs on PBS stations using the SAP channel plus movies on the Nostalgia Network carried on some, but by no means all, cable systems. The number of cable systems and PBS stations carrying the available described programs is growing, but the number of programs must be greatly increased.

Other delivery systems such as dialtone services, satellites and digital TV have great promise for the visually impaired in terms of the capacity to include descriptions as well as the convenience to visually impaired people who welcome services which can be brought directly into the home without, for example, requiring trips to and from the local video store.

Officials from the Bell Atlantic System are currently studying the capability of their present and proposed delivery systems for carrying descriptions.

No critical mass -- yet

16. 17. There is presently so little description available for low vision and blind people on television that it would be impossible to state which programs are more likely to be described. What exists now is a sample service. The scope of present day service is so limited that it has never been able to reach a critical mass or have much of an influence upon peoples' lives. Today it is more a novelty and a rainbow.

Discrimination

Blind and low vision people have been the targets of discrimination by both the federal government and private industry. When closed captioning began, the federal government invested nearly \$8,000,000 in start-up costs. For video description only \$850,000 was made available.

Today the Department of Education annually allocates \$8,000,000 plus to closed captioning, but only 1.5 million to video description. In private industry television producers and the motion picture industry foot the bills for captioned programs and videos. But with one exception anything described on television or on video cassettes has been paid for by the describing organizations themselves, primarily DVS in Boston and The Narrative Television Network in Tulsa, Oklahoma.

Digital can overcome ...

Digital television is promising because there will be many available channels or tracks and therefore no excuse for not including descriptions because of lack of space. At present although increasing numbers of PBS stations are becoming equipped to transmit described programs over their SAP channels it is not known how many commercial television stations or cable systems have the capacity to deliver descriptions.

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18. The costs cited by the FCC in this paragraph are essentially accurate. Descriptions now are somewhat more expensive than closed captioning, but this in part is because descriptions have been produced in such limited quantities that there has been no opportunity to develop an economy of scale which surely will bring down the costs, as it did with captioning.

Description suppliers

19. At present there are only two major suppliers for described programs: DVS in Boston and Narrative Television Network in Tulsa. The non-profit Metropolitan Washington Ear has produced descriptions for IMAX films and short videos of an educational nature. We no longer do television shows. An organization in Houston, Texas produces descriptions for a limited number of programs aired over Houston's PBS station.

Audio Optics Inc. in New Jersey produces a limited number for home videos.

AudioVision in California has produced occasional descriptions for television programs aired locally.

If the demand for described programming greatly expands as it should, new organizations will spring up to meet the challenge just as they did for closed captioning.

20. 21. Even before description costs can be lowered (as they surely will be), they still constitute only a small to tiny fraction of the total production costs of most television programs and films. *We therefore believe these costs should be borne by the producers.*

If federal funds for both captioning and video description are significantly reduced, the effects upon the little description we now have would be devastating. We must look for alternatives. We cannot be limited to charitable contributions from the private sector. Private funding has proved to be woefully inadequate.

If the federal government continues to give significant support to closed captioning as it does now, the figure for video description should be raised to more nearly equal levels. Failure to do so is rank discrimination.

Market incentives

23. In the broadcast world commercial television provides no described programs. Only PBS does.

If programs on commercial television were described, advertisers would reach a larger audience, especially among older people. In most cases it would not be necessary to describe the advertisements, but it could be done if advertisers thought this would increase their sales.

24. Narrative Television Network's success proves that there is a commercial market. However, their formula and approach does not mean that increasing numbers of programs should have built-in descriptions which all viewers, sighted or not, must hear. NTN recognizes that their present approach is a good way to publicize the existence of description by bringing it to the attention of people who would otherwise be unaware of such a service. In the long run, descriptions should increasingly also be on a separate channel such as the SAP channel to permit viewers to use video description only if wanted.

Mandates: a kick start for revenue

27. While we would prefer voluntary social and community responsibility and voluntary compliance with the spirit of the Americans with Disabilities Act, after meetings and other contacts with film and video producers and carriers we now believe that the gross discrimination between accessibility they now provide for the hearing impaired and accessibility they do not provide for the seeing impaired will continue unless certain mandates are put in place.

As we have noted, the sheer numbers of blind and visually impaired people and others who will benefit do indeed constitute a very large untapped market for described video materials. We believe that this market, growing larger every day, will justify and even command the attention of program producers and distributors as a commercially viable source of revenue.

In the meantime, unless the pump to this market is primed by an FCC-imposed mandate, the program production and distribution infrastructure will not generate the momentum needed to get the industry moving.

Unfortunately, as with so many socially useful programs that turn out to be commercially remunerative (recycling, nondiscrimination, etc.) it takes a "kick start" in the way of a federal mandate to break the industry out of its rut.

There are none so visually impaired as those who will not see.

We believe that all program carriers (broadcasters, cable television operators, video dial tone providers, satellite systems and others to be developed) must be capable of relaying video description as well as captioning. And receivers must be capable of receiving both these important accessibilities.

Because there are now so few of them, described programs would need to be phased in over a period of perhaps five years. The cost of producing descriptions will come down as the descriptions are produced in greater volume, but even at today's rates the cost is but a tiny fraction of the budget for the majority of films or programs.

The Communications Act allows the communications industry to create megacompanies capable of reaping enormous profits. It is only fair that in return, they should exercise

social responsibility by making their products accessible to both the deaf and the blind.

Too, the federal government should not be discriminating by insuring and supporting accessibility for people who are the deaf and hard of hearing -- as indeed it should -- but not provide for accessibility for blind and low vision people. This is rank discrimination.

Exemptions

Certain types of programming would have to be exempted from the description requirement. These exemptions would include but not be limited to programs with production costs below a specified level, and programs such as newscasts, sports events or MTV which would be impossible or impractical to describe.

A panel of qualified visually impaired and sighted people could be responsible for recommending programming for the exempt status.

Blind & deaf needs differ

28. & ff The needs of the blind and deaf are not totally parallel. For deaf people who are cut off from all spoken dialogue or sound effects, closed captioning is necessary for virtually everything. For low vision and blind people, descriptions are only practical or necessary for programs which have enough essential visual elements not accompanied by either spoken dialogue or narration. For example, newscasts may have visuals which could be interesting to describe, but they are wall-to-wall talking which cannot be interrupted.

Quality standards

Low vision and blind people are concerned about standards for both the technical quality and content of the descriptions. If descriptions cannot be clearly understood they may as well not exist. If the background sound in the program sound track is elevated -- as in a war scene, for example -- it should be lowered on the description track so the description can be heard with ease.

Another important factor is the quality of the narrator's voice. If the delivery is a monotone with few inflections, or is heavily accented, it can detract from the total experience of the program by drawing undue attention to the describer.

The description content quality can vary. Language can be repetitious, reflect an impoverished vocabulary or omit significant information which could have been readily included. Ideally, there should be minimum standards for the selection and training of description writers plus at least minimum requirements for editing after a first written draft has been completed. Writers need to be sensitized to the differences between what is learned through the sound track and what is only accessible through adequate vision. They also need to learn how to describe only the essential visual elements without attempting to interpret or explain the motives of the characters in a drama or sitcom.

Beware of quick, cheap and dirty

Some mechanism should exist to insure minimum quality. Otherwise descriptions could be quick, cheap and dirty and fail to meet adequately the needs of the target audience.

It is not possible to add description to great numbers of programs immediately. Technical changes will have to be accomplished. Guidelines for programs which should be described must be developed. However, deadlines do need to be imposed.

We congratulate the FCC for this Notice of Inquiry. We are looking forward to the results of the study which we hope will be concluded as soon as possible as a result of the Communications Act.

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MOVIE ACCESS COALITION

AARP	American Association of Retired Persons
ACB	American Council of the Blind
AFB	American Foundation for the Blind
ALA	American Library Association
AER	Association for the Rehabilitation of the Blind and Visually Impaired
AMB	Association for Macular Diseases
BVA	Blinded Veterans Association
FFB	Foundation Fighting Blindness
GP	Gray Panthers
MDI	Macular Degeneration International
MWA	Metropolitan Washington Ear
NAPVI	National Association of Parents of Visually Impaired
NAPH	National Association for Visually Handicapped
NCOA	National Council on the Aging. Inc.
NOD	National Organization On Disability
PBS	Prevention of Blindness Society
WIB	World Institute on Disability

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